

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

SECURITIES AND EXCHANGE
COMMISSION

Plaintiff

v.

GALLEON MANAGEMENT, LP,
RAJ RAJARATNAM,
RAJIV GOEL,
ANIL KUMAR,
DANIELLE CHIESI,
MARK KURLAND,
ROBERT MOFFAT, and
NEW CASTLE FUNDS LLC,

Defendants.

No. 09-cv-8811 (JSR)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the United States District Courts for the Southern and

Eastern Districts of New York, I, Robert H. Hotz, a member in good standing of the bar of this

Court, hereby moves for an Order allowing the admission pro hac vice of:

Applicant Name: John M. Dowd
Firm Name: Akin, Gump, Strauss, Hauer & Feld LLP
Firm Address: 1333 New Hampshire Avenue NW
Washington, DC 20036
Phone Number: (202) 877-4000
Fax Number: (202) 877-4288

There are no pending disciplinary proceedings against Mr. Dowd in any State or Federal Court.

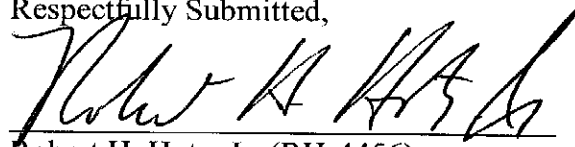
Dated: October 27, 2009
New York, New York

OCT 28 2009

FILED
U.S. DISTRICT COURT
2009 OCT 28 PM 2:45
S.D. OF N.Y.

704402-925 760

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert H. Hotz, Jr.", written over a horizontal line.

Robert H. Hotz, Jr. (RH-4456)

Akin Gump Strauss Hauer & Feld LLP

One Bryant Park

New York, NY 10036

(212) 872-1000

rhotz@akingump.com

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**AFFIDAVIT OF ROBERT H. HOTZ
IN SUPPORT OF MOTION TO
ADMIT COUNSEL PRO HAC VICE**

State of New York)

) ss:
County of New York)

ROBERT H. HOTZ, JR., being duly sworn, hereby deposes and says as follows:

1. I am a partner at Akin, Gump, Strauss, Hauer & Feld LLP, counsel for Defendant Raj Rajaratnam in the above captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Rajaratnam's motion to admit John M. Dowd as counsel pro hac vice to represent Mr. Rajaratnam in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on August 3, 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

4. Mr. Dowd is a partner at Akin, Gump, Strauss, Hauer & Feld, LLP in Washington, District of Columbia.

5. I have found Mr. Dowd to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Mr. Dowd, pro hac vice.

7. I respectfully submit a proposed order granting the admission of John M. Dowd, pro hac vice, which is attached hereto as Exhibit A.

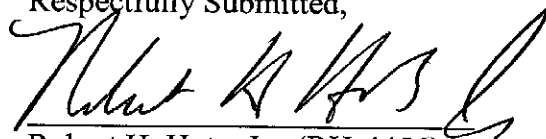
WHEREFORE it is respectfully requested that the motion to admit John M. Dowd, pro hac vice, to represent Defendant Raj Rajaratnam in the above captioned matter, be granted

Dated: October 27, 2009
New York, New York

Notarized:

JAIME M. SHELDON
Notary Public, State of New York
No. 01SH6140377
Qualified in QUEENS County
Commission Expires JANUARY 30, 2010

Respectfully Submitted,


Robert H. Hotz, Jr. (RH-4456)



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN M. DOWD

was on the 20TH day of JUNE, 1967

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on October 27, 2009.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

EXHIBIT A

**UNITED STATES DISTRICT COURT FOR THE
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Defendants.

No. 09-cv-8811 (JSR)

PROPOSED ORDER

UPON THE MOTION of Robert H. Hotz, Jr., attorney for Defendant Raj Rajaratnam,
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant Name:	John M. Dowd
Firm Name:	Akin, Gump, Strauss, Hauer & Feld LLP
Firm Address:	1333 New Hampshire Avenue NW Washington, DC 20036
Phone Number:	(202) 877-4000
Fax Number:	(202) 877-4288
E-mail Address:	<u>jdowd@akingump.com</u>

is admitted to practice pro hac vice as counsel for Defendant Raj Rajaratnam in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: _____
New York, New York

Honorable Jed S. Rakoff
United States District Judge

CERTIFICATE OF SERVICE

I, Robert H. Hotz, Jr., hereby certify that on October 28, 2009, I served a true and correct copy of the foregoing Pro Hac Vice Motion and accompanying materials for Attorney John M. Dowd upon all counsel of record registered to receive notice. Service was accomplished by regular mail to the following recipients:

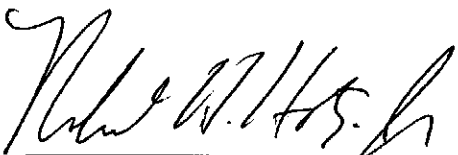
Israel E. Friedman
U.S. Securities and Exchange Commission
Three World Financial Center
New York, NY 10281

Jason Evan Friedman
U.S. Securities and Exchange Commission
Three World Financial Center
New York, NY 10281

Valerie Ann Szczepanik
U.S. Securities and Exchange Commission
Three World Financial Center
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Sanjay Wadhwa
U.S. Securities and Exchange Commission
Three World Financial Center
New York, NY 10281

David Rosenfeld
Securities and Exchange Commission
Northeast Regional Office
3 World Financial Center, Suite 400
New York, NY 10281

By: 

Robert H. Hotz, Jr. (RH-4456)
Akin Gump Strauss Hauer & Feld LLP
One Bryant Park
New York, NY 10036
(212) 872-1000
rhotz@akingump.com

Dated: October 28, 2009